

NEW HAVEN
REGIONAL
LEADERSHIP
COUNCIL

900 Chapel Street, 10th floor New Haven CT 06511 203-782-4340



January 30, 2010

Paul Stacey
Bureau of Water Protection & Land Reuse
State Department of Environmental Protection
79 Elm Street
Hartford, CT 06106

Re: Proposed Stream Flow Regulations

Dear Mr. Stacey,

The New haven Regional Leadership Council, an organization comprised of 25 businesses, opposes the state Department of Environmental Protection's proposed stream flow regulations which will have significant negative impacts on the amount of water available to meet the public health and safety needs of our state's businesses.

We support efforts to protect the state's aquatic life; however we are concerned that the proposed regulations do so to the detriment of the state's public health, safety and economic development. Under the proposed regulations, water companies and other large water users will have to release significant quantities of water into the streams during six different periods of the year regardless of whether they have sufficient water supplies to meet the existing needs of their customers. Restrictions on groundwater withdrawals will severely curtail the water available for the people and businesses of the state. This will undermine our economic competitiveness and quality of life by tipping the balance between competing water uses and placing the water needs of the state's aquatic life above all other needs. The last thing we need in these difficult economic times is more regulation.

Many water companies are also questioning whether they will have sufficient water supplies to support new development and residential construction. Without continued growth, our economy will stagnate. In addition, the proposed regulations will unnecessarily restrict water use during various periods of the year, which may be disruptive, particularly for those businesses that rely on a reliable supply of water, such as farmers, green house growers, hospitals, nursing homes, manufacturers and restaurants.

Moreover, the proposed regulations will require costly infrastructure changes, the development of new reservoirs and wells and require additional personnel and training to monitor flows and make the releases, all of which will translate to higher rates for water customers. This will add to the already high cost of doing business in this state, undermining our economic competitiveness.


Connecticut has experienced significant job losses in almost every industry sector. We are deeply concerned that further over-regulation will result in additional job losses in this state.

Unnecessary and overreaching regulations have contributed to the tremendous cost of state government as well as the cost of doing business. Connecticut must reduce the size and cost of state government and address its escalating deficit before moving forward with additional

comprehensive regulations that raise too many questions about whether we will have sufficient water supplies to support the business community and citizens of this state.

We therefore oppose the regulations as drafted, and request that DEP resume work with the Commissioner's advisory groups to draft more balanced, less intrusive and less costly stream flow regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Walsh". The signature is fluid and cursive, with the first name "Kevin" and last name "Walsh" clearly distinguishable.

Kevin Walsh

Chairman – Regional Leadership Council